

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MONICA BROWN, Individually and as)	
Heir of Mark A. Jaconski, Deceased,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 4:17-CV-01679-SNLJ
)	
TANYA DRUMMOND, PATRICIA)	
"PATSY" MARTIN, JACOB ALLEN,)	JURY TRIAL DEMANDED
SGT. CALEB NOLAND, SHERIFF JOHN)	
COTTLE, and LINCOLN COUNTY, MISSOURI,)	
)	
Defendants.)	

RELEASE AND SATISFACTION OF JUDGMENT

Plaintiff Monica Brown, Individually and as Heir of Mark A. Jaconski, Deceased, ("Plaintiff") hereby acknowledges and confirms payment by Defendant Lincoln County, Missouri ("Defendant") in the amount of Three Hundred Thousand and 00/100 Dollars (\$300,000.00) pursuant to the Judgment and Order of the Court approving the settlement for the injuries to and death of Mark A. Jaconski, deceased, and the distribution of the Settlement Proceeds to the heir and beneficiary of Mark A. Jaconski, deceased, with the distribution of the settlement payment to be as follows:

- a) The sum of One Hundred Seventy-Seven Thousand Five Hundred Ninety and 85/100 Dollars (\$177,590.85) to Monica Brown, individually, as the natural mother of Mark A. Jaconski, deceased, and as an heir and beneficiary of Mark A. Jaconski, deceased paid by Savers Property & Casualty Insurance Company on behalf of Defendant;
- b) The sum of One Hundred Two Thousand Four Hundred Nine and 15/100 Dollars (\$102,409.15) for attorney fees, expenses and costs paid by Savers Property & Casualty Insurance Company for and on behalf of Defendant to be distributed and paid to Frank, Juengel & Radefeld, Attorneys at Law, P.C.; and
- c) The sum of Twenty Thousand and 00/100 Dollars (\$20,000.00) to Monica Brown and Missouri Department of Social Services MO HealthNet Division in payment

of the Medicaid lien paid by Savers Property & Casualty Insurance Company for and on behalf of Defendant.

Plaintiff certifies that the above payments to her, her attorneys, and Missouri Department of Social Services MO HealthNet Division is the amount due in the Judgment rendered in this case on the 7th day of November, 2019 approving the settlement for the injuries to and death of Mark A. Jaconski, deceased, which sum is received and accepted in full payment and satisfaction of the Judgment, with interest and costs, and in full payment and satisfaction of any and all attorney fees, expenses, costs, and claims in case for the injuries to and death of Mark A. Jaconski, deceased, and to the proceeds of the Judgment the undersigned Plaintiff does hereby release, acquit and forever discharge Defendant Lincoln County, Missouri and its past, present and future agents, servants, employees, independent contractors, assigns, officials, appointed and elected officials, representatives, county commissioners, sheriffs, deputy sheriffs, county clerks, jailers, correction officers, jail administrators, insurers, including Savers Property & Casualty Insurance Company, and all other persons, firms, and corporations of and from all liability to and demand of the undersigned Plaintiff in respect to this cause and the Judgment entered herein.

This Release and Satisfaction of Judgment shall be filed in the Office of the Clerk of the United States District Court for the Eastern District of Missouri, Eastern Division, and the Clerk is hereby authorized and directed to enter this Release and Satisfaction of Judgment on the judgment docket of this Court and to release and satisfy the Judgment of record against Defendant Lincoln County, Missouri in the above-entitled cause.

Dated this ____ of November, 2019.

[The remainder of this page has been intentionally left blank]

Dated: 11/7/19

Monica G Brown
MONICA BROWN, Individually and as Heir of
Mark A. Jaconski, Deceased

STATE OF MISSOURI)
) ss.
COUNTY OF St. Louis)

On this 7th day of November, 2019, before me personally appeared **MONICA BROWN**, Individually and as Heir of Mark A. Jaconski, Deceased, to me known to be the person described herein, who executed this Release and Satisfaction of Judgment, Individually and as Heir of Mark A. Jaconski, Deceased and acknowledged that the facts set forth in the Release and Satisfaction of Judgment are true and correct, that she freely executed the same for the sole consideration therein expressed and upon advice of her attorney.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed my official seal on the day and year first above written.

Matthew A. Radefeld
Notary Public

My Commission Expires:



Respectfully submitted,

By: _____

Matthew A. Radefeld, #52288MO
Frank, Juengel & Radefeld
Attorneys at Law, P.C.
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Clayton, MO 63105
314-725-7777
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the attorney whose name appears above signed the original of this pleading and that true and correct copy of the foregoing was filed with the Clerk of the Court to be served by the operation of the Court's electronic filing system and sent via First Class U.S. Mail this 7th day of November, 2019 to:

D. Keith Henson, #31988MO
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Clayton (St. Louis), MO 63105
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khenson@pcblawfirm.com
Attorney for Defendant Lincoln County,
Missouri

/s/ Matthew A. Radefeld